



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 NORTH HILTON • BOISE, IDAHO 83706 • (208) 373-0502

JAMES E. RISCH, GOVERNOR
TONI HARDESTY, DIRECTOR

October 30, 2006

Certified Mail No. 7005 1160 0000 1550 8166

Ms. Diane Puri
General Manager
P. O. Box 177
Caldwell, ID 83606

RE: Facility ID No. 027-00067, Teton Sales Company, Caldwell
CAM Plan Update for Tier I Operating Permit Application

Dear Ms. Puri:

The Department of Environmental Quality (DEQ) has reviewed Teton Sales Company's compliance assurance monitoring (CAM) plan in Section 5.6.2 of the Tier I operating permit application dated May 5, 2005, and has determined that revisions to the plan are needed. In accordance with IDAPA 58.01.01.315.02, the following information needs to be submitted within 30 days after receiving this letter, or by November 30, 2006, whichever is earlier. Review of the application materials has ceased until the following information is submitted:

1. In Section 5.6.3.B, change the applicable particulate matter emissions limit to 1 lb/hr, as provided in Tier I Operating Permit Condition 3.5. The 20% opacity standard should be removed from the CAM Plan.
2. The indicator range for the pressure drop across the filter should be revised to reflect the expected pressure drop across a clean filter. The current lower limit of the proposed range (-0.05 inches of water) does not appear to represent proper operation of the filter. Please revise the lower limit of the range to include a positive pressure drop. The lower limit should be supported by clean filter pressure drop data from the filter manufacturer or other technical justification.
3. The QA/QC practices proposed for the monometer currently state that the monometer will be calibrated per manufacturer's recommendations. Please expand upon this statement by providing the frequency the monitor will be calibrated or zeroed.

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These revisions to the CAM plan were discussed via telephone with Melissa Armer of JBR Environmental Consultants on October 26, 2006. If you have any questions about this project or about the permitting process, please contact me at (208) 373-0502.

Sincerely,



Valerie Greear
Technical Services Division

VAG/bf Permit No. T1-050025

Attachment

G:\Air Quality\Stationary Source\SS Ltd\T1\Teton Sales\Teton Sales CAM Plan Revision Ltr.doc

c: Melissa Armer, JBR Environmental Consultants, Inc.
 Leonard Herr, Boise Regional Office
 Bill Rogers, Permit Coordinator
 Source File
 Reading File